1 2 3	Aron M. Oliner (SBN: 152373) Geoffrey A. Heaton (SBN: 206990) DUANE MORRIS LLP One Market Plaza Special Street Toward Strike 2200	
4	Spear Street Tower, Suite 2200 San Francisco, CA 94105-1127 Telephone: (415) 957-3000	
5	Facsimile: (415) 957-3001 Email: gheaton@duanemorris.com	
6	Attorneys for Chapter 7 Trustee E. LYNN SCHOENMANN	
7	INITED STATES DA	NIZDUDTOV COUDT
8 9	UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA	
10	SAN FRANCISCO DIVISION	
11		Case No. 21-30299 DM
12	In re	
13	ACEH CAPITAL, LLC,	Chapter 7 DECLARATION OF HESAM TOOLOEE
14	Debtor.	IN SUPPORT OF APPLICATION FOR ORDER AUTHORIZING EMPLOYMENT
15		OF A REAL ESTATE BROKER SUNRISER LANDCORE
16		INVESTMENTS]
17		[NO HEARING REQUIRED]
18		
19	I, Hesam Tooloee, declare:	
20	I am a real estate agent and broker licensed by the State of California, experienced	
21	in rendering real estate brokerage services, and am a realtor with Sunriser Landcore Investments	
22	("Sunriser"). I make this declaration of my own personal knowledge and could and would testify	
23	competently thereto if called upon to do so. As to any matters stated on information and belief, I	
24	believe my information to be true and correct.	
25	2. I provide this declaration in support of the Application for Order Authorizing	
26	Employment of Real Estate Broker ["Sunriser Landcore Investments"] ("Application") filed	
27	herewith.	
28	DM2/7666001	
DUANE MORRIS LLP SAN FRANCISCO	DECLARATION OF H. TOOLOEE ISO APPLICATION FOR ORDER AUTHORIZING EMPLOYMENT	

DECLARATION OF H. TOOLOEE ISO APPLICATION FOR ORDER AUTHORIZING EMPLOYMENT Case: 21-30299 Doc# 11 OF REINIOES ENDING ENDING PROBLEM PR

- 3. I am a licensed real estate agent, and have been employed in this field since 1987. I received by broker's license in 1990. Since 2000 I have specialized in selling vacant land in and around the Antelope Valley.
- 4. Sunriser has extensive experience and expertise in performing real estate brokerage services, including the listing and selling of residential real property.
- 5. Based upon my investigation, I believe that, except as described below, Sunriser has no connections with the Debtor, creditors, parties-in-interest, their respective attorneys and accountants, the United States Trustee or any person employed in the Office of the United States Trustee, and is a disinterested person within the meaning of 11 U.S.C. § 101(14).
- Pre-petition, I was engaged by ACEH Capital, LLC to sell vacant land. I am not owed any money by ACEH Capital, LLC, and neither do I owe any money to ACEH Capital, LLC.
- 7. I further believe that Sunriser does not hold or represent any interest adverse to this estate.
 - 8. Sunriser has not received a retainer from the Trustee for its anticipated services.
- 9. Sunriser has no agreement to share any compensation to be awarded in this case with any person.
- 10. Sunriser agrees to accept a sales commission from the purchase price of the real property described in the agreement attached as Exhibit A to the Application, subject to subsequent review by the Court if improvident in light of developments not anticipated at this time. Under the terms of the agreement, Sunriser, shall receive a commission of 10% of the sale price.
- 11. I have reviewed the Application, and agree to perform the services set forth in the Application on the terms and conditions stated therein.
- 12. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Walnut Creek, California on May , 2021.

Hesam Tooloee Ħ**ES**ME**Ŧ®**௵EŒ CALDRE#01012351

28

DUANE MORRIS LLP